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Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

NINGBO BONNY E-HOME CO.,  
LTD., a corporation of China

Plaintiff,

v.

ONDWAY, POOLCLEAN US  
STORE, USA WAREHOUSE,  
BOWANJIE, INPOOL US STORE,  
DEWFOND, DIGIGER,  
MOTOBUDDY STORE, and et al.  
Individual, Partnerships  
Defendants.

Case No. 2:24-cv-00568

DECLARATION OF HONG CHUAN ZHANG IN SUPPORT OF PLAINTIF'S  
APPLICATION FOR ENTRY OF A TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION

I, HONG CHUAN ZHANG, do hereby declare:

1. I am over eighteen (18) years of age. I have never been convicted of a felony or any criminal offense involving moral turpitude, and I am fully competent to testify to the matters stated herein. I have personal knowledge of every statement made in this Declaration and such statements are true and correct.

2. I am the President and owner of NINGBO BONNY E-HOME CO., LTD., a corporation of China and the Plaintiff in this case of infringement.

3. I make this declaration in support of Plaintiff's Application for Entry of a Temporary Restraining Order and Preliminary Injunction against Defendants.
4. The Defendants use the interactive commercial Internet websites and Internet based e-commerce stores including the Amazon Marketplace ("Online using the seller identities, product names and store names set forth in Exhibits 2-9 of the Complaint").
5. I founded NINGBO BONNY E-HOME CO., LTD LLC ("NINGBO BONNY" or "Plaintiff") in China which makes pool brushes with a very unique design which was patented at the United States Patent and Trademark Office as Design Patent No. D985,947. This design was used to create products and packaging using costly industrial design and tooling. A large amount of cost was involved in creating a prototype with high quality for consumers. Today, our design is well known and recognized for its quality.
6. Our pool brush product is called Pool Brush Head with Detachable Round Brush and my company has spent substantial resources in advertising it and establishing it as a legitimate product which owners like to buy on the Internet for use in the warm months to clean their pools.
7. Over the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing have become increasingly important to Ningbo Bonny's overall marketing. For the patented Pool Brush Head, Ningbo Bonny has spent more than a million dollars in marketing and advertising. In addition, Ningbo Bonny and its authorized distributors expend significant monetary resources on Internet marketing, including search engine optimization ("SEO") strategies. Other costs include print catalog ads, trade shows, and handing out free samples. These strategies allow its authorized retailers to fairly and legitimately educate consumers about the value associated with our company.
8. Unlike our company, Defendants have avoided any of these costs of design and of product development. Instead of spending money on the design and development of a pool brush, Defendants have copied our legitimate, patented design and placed them for sale on Amazon and other individual seller's stores.

Defendants then wrongly index their products and stores on search engines and compete directly with Ningbo Bonny for space in the search results.

9. Due to the success of Ningbo Bonny excellent product design, we have become the target of multiple infringers seeking to profit by copying the registered patented design.

10. Plaintiff has been forced to police the Amazon marketplace and other various Internet marketplaces to identify and seek takedowns of unlawful listings for the Infringing Products since allowing the unlawful listings to continue is causing damage to our bottom line. Some Defendants sell their fake pool brushes at a fraction of Plaintiff's price.

11. The nature of the software Amazon and various Internet Marketplaces is to sort the lowest priced items to the top which means that Ningbo Bonny's legitimate product, which is priced to reflect its costs, may be ignored.

12. Another major problem with the Internet Marketplaces is that there is a direct and convenient connection between various Chinese and other unidentified manufactures to the Infringing Products. In essence, a counterfeiter in Vietnam or Russia, for example, may order a crate of Infringing Products from a Chinese manufacturer, have them drop shipped to a fulfillment center in the United States, and then sell the Infringing Products to a US consumer through a Third-Party Service Provider. The ease of this system encourages knockoffs to flourish.

13. For these reasons, Plaintiff retained the legal counsel of RayChan IP Law firm, 108 N Ynez Ave #213, Monterey Park, CA 91754 to pursue Defendants. ("the RayChan IP firm") and to help in the policing on Amazon marketplace and other various Internet marketplaces. During the process, the RayChan IP firm identified many Chinese manufacturers operating on Marketplace Storefronts hosted by the Internet marketplaces. These manufacturers were supplying many of the other identified Defendants with infringing products flooding the Internet marketplaces and damaging our business.

14. This damage to our business will continue unless we receive the sought after restraining order and injunctive relief.

15. Defendants' sales, distribution, and advertising of the Infringing Product are highly likely to cause consumers to believe that Defendants are offering genuine versions of our product when they are not.

16. In sum. Defendants are selling pool brushes that infringe my company's design patent by offer and sale of unauthorized infringing products that damaged our business and severely reduced revenues. Defendants' sales of infringing products have damaged our business and have experienced reduced revenues that I attribute to the infringing products being sold on the market.

17. I provided my lawyers with evidence of the reduced revenues and the need to stop those sales. Attached is a spreadsheet of summary of defendants infringing sales on Amazon.com of the infringing products that I prepared from internet research.

18. The best evidence of damage from copying is the reduced revenues my company has received which I believe can be attributed to the copycats and their aggressive marketing in trying to imitate and get involved unfairly internet searching to fool the customer about the copies being a legitimate product.

19. I have attached to this declaration, a summary of my company's reduced revenues which shows the plight of a company such as mine that has a successful product based on a registered, patented design, but that success has caused copying those damages legitimate income quality that Plaintiff's Products have earned.

20. Defendants do not have, nor have they ever had, the right or authority to use our patented design for any purpose. Defendants' unlawful activities have deprived and continue to deprive Plaintiff of their rights to fair competition. By their activities, Defendants are defrauding Plaintiff and the consuming public for Defendants' benefit.

21. Defendants should not be permitted to continue their unlawful activities, which are causing Plaintiff ongoing irreparable harm. Accordingly, Plaintiff is seeking entry of a temporary restraining order prohibiting Defendants' infringement of the Plaintiff.

22. Given Defendants' copying and therefore infringement in violation of patent law, the Infringing Products are indistinguishable to consumers, both at the point of sale and post-sale. By using Plaintiff's intellectual property, Defendants have created a false association between their Infringing Products, their Internet e-commerce stores, and Plaintiff. Plaintiff's IP by creating the impression that infringement may be undertaken with impunity which threatens Plaintiff's ability to attract investors and markets for Plaintiff's Products.

23. I have reviewed Exhibits 2-9 of the Complaint and the indicated web listings and upon my information and belief, the Defendants named in this case are currently manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and or/selling non genuine, infringing versions of Plaintiff's Product and illegally using the registered design in a matter which is confusing to consumers and the Defendants are putting for sale online products which are illegal non-genuine, copies of Plaintiff's Product directed to U.S. consumers, including those consumers in Pennsylvania, through their Amazon and other e-commerce stores.

24. None of the identified Defendants are authorized re-sellers of genuine versions of Plaintiff's Product. Moreover, none of the identified Defendants are authorized to manufacture, import, export, advertise, offer for sale or sell Plaintiff's Products. Ningo Bonny has never consented or granted permission to any of the identified Defendants to use Plaintiff's Design.

25. I have confirmed that all of the identified products pictured in Complaint Exhibits 2-9 are infringements of Plaintiff's rights.

26. Upon information and belief, the Defendants in this were and/or are currently manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling infringing and unfairly

competing products which copies and infringes Plaintiff's rights by selling online to sell to U.S. consumers, including those consumers in Pennsylvania, through their Amazon and other Online Marketplace Storefronts.

27. Through visual inspection of Defendants' listings for Infringing Products, it was confirmed that each Defendant is featuring, displaying Plaintiffs patented design, without authorization and that the products that each Defendant is offering infringing versions of the Plaintiff's Product. The checkout pages or order forms for the Infringing Products confirm that each Defendant was and/or is still currently offering for sale and/or selling Infringing Products through their respective Amazon or other Merchant Storefronts and User Accounts and that each Defendant provides shipping and/or has actually shipped Infringing products to the United States.

28. A shipping address located in Western District of Pennsylvania verified that each Defendant provides shipping to the Pennsylvania Address.

29. I inspected the detailed web listings describing the Infringing Products that Defendants are offering for sale through the Internet based e-commerce stores operating under each of their respective Seller IDs, and determined the products were not genuine versions of Plaintiff's Product. Further, each of the Defendant's web listing infringes on the Plaintiff's Work. Finally, each individual Defendant's product that was received was physically examined and confirmed not to be authentic.

30. Defendants' actions have caused and will continue to cause, in the event the requested relief is not granted, irreparable harm to Plaintiff's goodwill and reputation as well as to the unassuming consumers who will continue to believe that the Defendants' infringing products are produced, authorized, approved, endorsed or licensed by Plaintiff, when they are not.

31. Defendants' intentional and illegal conduct, including offering for sale and selling inferior infringing and knock-offs into the U.S. and the Commonwealth of Pennsylvania has caused lost profits to Plaintiff and damaged the inherent value of Plaintiff's business and the Plaintiff's patented design as well as impeding

Plaintiff's ability to attract new customers and business. Defendants are willing and in bad faith infringing Plaintiff's rights, thereby unjustly profiting from such activities at Plaintiff's expense.

32. All of the injuries and damages described above are taking place in the United States, including in Pittsburgh, Allegheny County, Pennsylvania.

33. In addition to trying to stop the injuries and damage caused to our business, Plaintiff is also seeking in this lawsuit to protect consumers from being exposed to and purchasing the infringing products that wrongly use Plaintiff's rights.

34. I have worked with the RayChan IP law firm to assist them in identifying infringing products and have provided them with various leads in order to find the various outlets for the infringing and knock-off products. If called upon by the Court, I can explain how the products were examined to determine infringement and the extent which these unauthorized copies are causing damage to business of the products with legitimate design.



















I declare under penalty of perjury that the foregoing is true and correct.

Executed at Ningbo, China, April 16, 2025

A handwritten signature in black ink that reads "Hong chuan zhang". The signature is written in a cursive, slightly slanted style.

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Hong Chuan Zhang, President Ningbo Bonny E-Home Co, Ltd.

SELLER	BRAND	ASIN	PICTURE	LINK	SELLER INFORMATION	SALES	STORE SALES
Oneday	LALAPOL	B0C3HQGX81		<a href="https://www.amazon.com/dp/B0C3HQGX81/ref=spsa_dk_detail_0?ie=UTF8&amp;psc=1&amp;pd_rd_j=8pd_rd_j=B0C3HQGX81p13NParams&amp;s=kitchen&amp;sp_csd=d2lkZ2V0TmF1ZT1zcf9kZXRhWwxfidGhlbWVFaWVM">https://www.amazon.com/dp/B0C3HQGX81/ref=spsa_dk_detail_0?ie=UTF8&amp;psc=1&amp;pd_rd_j=8pd_rd_j=B0C3HQGX81p13NParams&amp;s=kitchen&amp;sp_csd=d2lkZ2V0TmF1ZT1zcf9kZXRhWwxfidGhlbWVFaWVM</a>	Business Name: OPHIMIST INTERNATIONAL LIMITED Business Address: 千禧城17栋1单元1801 武汉市 桥口区 湖北	1550	\$628,465.78
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		B0C6JVPTRL		<a href="https://www.amazon.com/dp/B0C6JVPTRL/ref=spsa_dk_detail_0?ie=UTF8&amp;s=kitchen&amp;sp_csd=d2lkZ2V0TmF1ZT1zcf9kZXRhWwxfidGhlbWVFaWVM&amp;th=1">https://www.amazon.com/dp/B0C6JVPTRL/ref=spsa_dk_detail_0?ie=UTF8&amp;s=kitchen&amp;sp_csd=d2lkZ2V0TmF1ZT1zcf9kZXRhWwxfidGhlbWVFaWVM&amp;th=1</a>	currently unavailable	150	/
MOTORBUDDY	MOTORBUDDY	B0CDGJ36K		<a href="https://www.amazon.com/dp/B0CDGJ36K/ref=spsa_dk_detail_2?pd_rd_j=B0CDGJVM8N&amp;pd_rd_w=cCk1w&amp;content-id=amzn1.sym.0d1092dc-81bb-493f-8769-d5c802257e94&amp;pf_rd_p=0d1092dc-81bb-493f-8769-d5c802257e94&amp;pf_rd_r=VMZWJKDQ89B73XTDV A3Z8&amp;pd_rd_wg=aeB1W&amp;pd_rd_r=02077140-755d-48b0-a4d4-41de0b76004b&amp;s=awn">https://www.amazon.com/dp/B0CDGJ36K/ref=spsa_dk_detail_2?pd_rd_j=B0CDGJVM8N&amp;pd_rd_w=cCk1w&amp;content-id=amzn1.sym.0d1092dc-81bb-493f-8769-d5c802257e94&amp;pf_rd_p=0d1092dc-81bb-493f-8769-d5c802257e94&amp;pf_rd_r=VMZWJKDQ89B73XTDV A3Z8&amp;pd_rd_wg=aeB1W&amp;pd_rd_r=02077140-755d-48b0-a4d4-41de0b76004b&amp;s=awn</a>	Business Name: NingBoShiYinZhouChangXing QiCheAnQuanYongPinYouXia n Business Address: 潘火街道潘火路215号1801-1a室 宁波市 鄞州区	1000	\$581,443.26
BSJYIFAN	BSJYIFAN	B0D4Q6L92T		<a href="https://www.amazon.com/Swimming-Cleaning-Including-Skimmer-Ground/dp/B0D4Q6L92T/ref=sr_1_1?crd=1JTRY E22QUKWb&amp;dib=evJ2ioiMSJ9.2cweNaAWA/5h2 RkqF7ZneA.1xOHLCPfQyHwJvA75OnG675BU. NKsEDOKxHu9Ah0c&amp;dib_tag=s&amp;keywords=B0D4Q6L92T&amp;qid=1738918099&amp;sprefix=b0d4q6l92t%2Caps%2C360&amp;sr=8-1&amp;th=1">https://www.amazon.com/Swimming-Cleaning-Including-Skimmer-Ground/dp/B0D4Q6L92T/ref=sr_1_1?crd=1JTRY E22QUKWb&amp;dib=evJ2ioiMSJ9.2cweNaAWA/5h2 RkqF7ZneA.1xOHLCPfQyHwJvA75OnG675BU. NKsEDOKxHu9Ah0c&amp;dib_tag=s&amp;keywords=B0D4Q6L92T&amp;qid=1738918099&amp;sprefix=b0d4q6l92t%2Caps%2C360&amp;sr=8-1&amp;th=1</a>	Business Name: Zhulin He Business Address: 福城街道福前路阳基师龙山2栋16A 深圳市 龙华区 广东省 518000	200	\$107,334.26
Tendawell	Tendawell	B0DFQ2JD3D		<a href="https://www.amazon.com/Tendawell-Cleaning-Adjustable-Inground-Swimming/dp/B0DFQ2JD3D/ref=sr_1_1?crd=13FP4S7LUC857F&amp;dib=evJ2ioiMSJ9.qsOr6BJlx345 qVkdofmLq.7VCOWZ0d.3x2wuiA6WGvyP8e2Idp">https://www.amazon.com/Tendawell-Cleaning-Adjustable-Inground-Swimming/dp/B0DFQ2JD3D/ref=sr_1_1?crd=13FP4S7LUC857F&amp;dib=evJ2ioiMSJ9.qsOr6BJlx345 qVkdofmLq.7VCOWZ0d.3x2wuiA6WGvyP8e2Idp</a>	Business Name: Jian li shi peng ci mao yi gong zuo shi Business Address: 尺八镇 杨柳村六组48号 荆州市监利市 湖北省 433328 CN	/	\$11,514.67
		B0DD7HS4T9		<a href="https://www.amazon.com/Bristles-Reinforced-Aluminium-Cleaning-Inground/dp/B0DD7HS4T9/ref=sq_bsnr_q_1272984011_d_scd_3/147-0092123-5148651?psc=1">https://www.amazon.com/Bristles-Reinforced-Aluminium-Cleaning-Inground/dp/B0DD7HS4T9/ref=sq_bsnr_q_1272984011_d_scd_3/147-0092123-5148651?psc=1</a>	/		

## REDUCED REVENUES OF PLAINTIFF

The ERP screenshots of Bonny

FRONT PAGE		PRODUCT PERFORMANCE		PROFIT STATEMENT	
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首页		产品表现		利润报表		+	
ASIN	父ASIN	MSKU	SKU	SPU	店铺	STORE	
全部国家	全部店铺	Listing标签	自动标签	按天	2022-01-01 - 2022-12-31	原币种	全部广告
Product Information		ANALYZE		Store / Country		Product Name	
Sales Volume		按下单时间统计退货退款		显示			
商品信息	分析	店铺/国家	MSKU	品名/SKU	销量	订单量	Order Quantity
B09DRPB9WH		poolvio-US 美国	PVBT805 \$32.99	17.5寸墙刷 T805	11821	11750	\$410899.76
B09XMLZRRX		poolvio-US 美国	29-MSJ7-9940 \$32.99	球头刷 T805J	2499	2485	\$83690.10

首页		产品表现		利润报表		+	
ASIN	父ASIN	MSKU	SKU	SPU	店铺		
全部国家	全部店铺	Listing标签	自动标签	按天	2023-01-01 - 2023-12-31	原币种	全部广告
						按下单时间统计退货退款	
						显示	
商品信息	分析	店铺/国家	MSKU	品名/SKU	销量	订单量	销售额
B09DRPB9WH		poolvio-US 美国	PVBT805 \$31.59	17.5寸墙刷 T805	10456	10302	\$315725.32
B09XMLZRRX		poolvio-US 美国	29-MSJ7-9940 \$29.59	球头刷 T805J	3994	3929	\$121759.98
B093WFP1B8		poolvio-CA 加拿大	PVB00804 CA\$37.58	17.5寸墙刷 PVB805-1	11	10	CA\$345.95

首页		产品表现		利润报表		+	
ASIN	父ASIN	MSKU	SKU	SPU	店铺		
全部国家	全部店铺	Listing标签	自动标签	按天	2024-01-01 - 2024-12-31	原币种	全部广告
						按下单时间统计退货退款	
						显示	
商品信息	分析	店铺/国家	MSKU	品名/SKU	销量	订单量	销售额
B09DRPB9WH		poolvio-US 美国	PVBT805 \$29.99	17.5寸墙刷 T805	4462	4376	\$100256.20
B09XMLZRRX		poolvio-US 美国	29-MSJ7-9940 \$29.99	球头刷 T805J	2529	2477	\$55547.64

Declaration in Support of Motion for TRO and Injunction